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Attorney for Plaintiff  
**IRENE LUGO**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

IRENE LUGO,

Plaintiff,

V.

C.R. BARD, INC. and BARD  
PERIPHERAL VASCULAR INC

Defendant.

Case No. 2:16-cv-02913-DGC

Consolidated into lead case:  
MDL No. 2:15-MD-02641-DGC

**JOHN C. HATCH'S MOTION TO  
WITHDRAW AS COUNSEL OF RECORD  
FOR PLAINTIFF AND CHANGE OF  
ADDRESS; [PROPOSED] ORDER  
GRANTING MOTION TO WITHDRAW;  
CERTIFICATE**

John C. Hatch, herby moves to withdraw from *pro hac vice* representation of Plaintiff, Irene Lugo. Accordingly, counsel respectfully requests permission to withdraw from further representation of Plaintiff, Irene Lugo, as John C. Hatch is changing law firms. Plaintiff will not be prejudiced as Amir M. Kahana will continue to act as Plaintiff's counsel for representation in this litigation. The updated address for John C. Hatch is 350 Oak Street, Laguna Beach, CA 92651.

A form of order is submitted herewith for the Court's convenience.

RESPECTFULLY SUBMITTED this 13th day of September, 2016

By: /s/ John C. Hatch  
Attorney for Plaintiff

**MOTION AND [PROPOSED] ORDER TO WITHDRAW AS COUNSEL OF RECORD;**

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2 I certify that on this 13th day of September, 2016, I electronically transmitted a PDF  
3 version of this document to the Clerk of Court, using the CM/ECF System, for filing and  
for transmittal of a Notice of Electronic Filing.

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5 By: /s/ John C. Hatch  
6 Attorney for Plaintiff  
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MOTION AND [PROPOSED] ORDER TO WITHDRAW AS COUNSEL OF RECORD;

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8  
9 Attorney for Plaintiff  
10 IRENE LUGO  
11  
12

13 **IN THE UNITED STATES DISTRICT COURT**  
14  
15 **FOR THE DISTRICT OF ARIZONA**

16 IRENE LUGO,

17 Plaintiff,

18 v.

19 C.R. BARD, INC. and BARD  
20 PERIPHERAL VASCULAR, INC.,

21 Defendant.

22 Case No. 2:16-cv-02913-DGC

23 Consolidated into lead case:  
24 MDL No. 2:15-MD-02641-DGC

25 **[PROPOSED] ORDER GRANTING  
26 MOTION TO WITHDRAW AS  
27 COUNSEL OF RECORD FOR PLAINTIFF  
28 AND CHANGE OF ADDRESS**

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30 John C. Hatch seeks to withdraw as counsel *pro hac vice* for Plaintiff in the above  
31 captioned litigation pursuant to Local R. 83.3(b)(2). As this Court finds that Mr. Hatch has  
32 submitted satisfactory reasoning for withdrawal, and that the granting of this motion will not  
33 cause substantial prejudice or delay to any party.

34 **IT IS HEREBY ORDERED** that John C. Hatch's Motion to Withdraw as Counsel for  
35 Plaintiff is GRANTED, and John C. Hatch is hereby terminated as counsel *pro hac vice* in this  
36 proceeding.

37 DATED: \_\_\_\_\_

38 By: \_\_\_\_\_  
39 Hon. David G. Campbell  
40 United States District Judge

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42 MOTION AND [PROPOSED] ORDER TO WITHDRAW AS COUNSEL OF RECORD;

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Attorney for Plaintiff  
**IRENE LUGO**

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FOR THE DISTRICT OF ARIZONA**

IRENE LUGO,

Plaintiff,

V<sub>1</sub>

C.R. BARD, INC. and BARD  
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Defendant.

Case No. 2:16-cv-02913-DGC

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**CERTIFICATE OF JOHN C. HATCH  
ACCOMPANYING MOTION FOR  
WITHDRAW**

I, John C. Hatch, hereby attest that Plaintiff, Irene Lugo, consents to my withdrawal as her counsel. Plaintiff has been notified in writing of my withdrawal and the status of the case. She is aware that Amir M. Kahana will continue to represent her for this litigation.

By: /s/ John C. Hatch  
Attorney for Plaintiff